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**From:** Cozzie, David [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=EE8C3582A39D4D81AC38F29A2B3ABB2D-DCOZZIE]  
**Sent:** 12/12/2017 6:07:28 PM  
**To:** Mills, Kathy [Mills.Kathy@epa.gov]  
**CC:** Thompson, Lisa [Thompson.Lisa@epa.gov]; Marsh, Karen (Marsh.Karen@epa.gov) [Marsh.Karen@epa.gov]  
**Subject:** RE: Meeting with Shell regarding OOOOa NSPS

KB,

With regards to Shell, they are coming in to talk about NSPS OOOOa. They reached out to Peter and me last week. Some of the points that they will raise are as follows:

1. Strong interest in ensuring that the key technical issues are resolved quickly regardless of how the issue of regulating methane is resolved
2. Specific technical fixes that they are especially interested in are:
  - PE Certification
  - Monitoring frequency
  - State Equivalency AMELS
  - Recordkeeping and reporting burden
  - Facilitating new technology (e.g., drones)
3. Emerging technology – both streamlining and identifying key criteria for development
4. Separate rulemakings (technical separated from methane issue) and to the extent possible ensuring the technical issues are severable and remain regardless of the path forward on methane
5. Voluntary programs and the relationship to regulation

Hope that helps,

David

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**From:** Mills, Kathy  
**Sent:** Tuesday, December 12, 2017 10:26 AM  
**To:** South, Peter <South.Peter@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>  
**Subject:** RE: Meeting with Shell regarding OOOOa NSPS

Will get you something, team is briefing Bill right now.

Kathy "KB Mills ~ SPPD ~ U. S. EPA, OAQPS ~ 919-541-1599

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**From:** South, Peter  
**Sent:** Tuesday, December 12, 2017 9:43 AM  
**To:** Mills, Kathy <Mills.Kathy@epa.gov>  
**Cc:** French, Chuck <French.Chuck@epa.gov>; Cozzie, David <Cozzie.David@epa.gov>  
**Subject:** Meeting with Shell regarding OOOOa NSPS

Hi KB,

We don't have much on this meeting other than Shell wants to talk about OOOOa. Bill knows O&G pretty well so we don't need background on the rule. I think we probably just need to provide any comments and/or interactions we've had with Shell wrt to O&G.

Thanks and call me with any questions.

Organizer	Wehrum, Bill			Sent	Thu
Subject	Meet with Shell re: OOOOa NSPS Reconsideration Rulemaking (Confirmed)				
Location	WJC-N 5400				
Start time	Wed 12/13/2017		11:00 AM		<input type="checkbox"/> All day event
End time	Wed 12/13/2017		11:45 AM		

**To:** Bill Wehrum, Mandy Gunasekara, David Harlow, Sarah Dunham, Paul Gunning, Peter Tsigotis, Steve Page, David Cozzie, Mike Koerber; Harnett, Bill

**Outside Attendees (in person):**

- Sara Glenn, Director, Federal Government Relations and Senior Counsel, Upstream
- Marnie Funk, Director on Environmental Matters
- Kristin Whitman, Senior Advisor, Government Relations
- Stephen Fotis, Van Ness Feldman



FW: Meeting    Confirmed 12/13    RE: Confirmed  
Request for Shel... at 11am: Meeti... 12/13 at 11am: ...